

# EXHIBIT 1

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

FAMILY COURT

CASE TYPE: Family Other

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LINDSEY MIDDLECAMP,

Petitioner,

-- against --

Court File No.: 62-HR-CV-17-233

BROCK FREDIN,

Respondent.

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**RESPONDENT BROCK FREDIN'S FIRST SET OF INTERROGATORIES**

Pursuant to Rule 33 of the Minnesota Rules of Civil Procedure, you are requested and required to furnish answers to the following Interrogatories to Respondent Brock Fredin within thirty (30) days from the date of service. These Interrogatories are continuing and require supplemental answers if additional responsive information is obtained, discovered or created.

**DEFINITIONS**

a. "You" or "Your" means Petitioner Lindsey Middlecamp in the action *Lindsey Middlecamp v. Brock Fredin*, Court File No.: 62-HR-CV-17-233, pending in the Minnesota District Court for the County of Ramsey, Second Judicial District, and any other person acting or purporting to act under the authority or on behalf of Petitioner Lindsey Middlecamp, including her agents, attorneys and representatives.

b. "Brock Fredin" or "Respondent" means Respondent Brock Fredin in the *Lindsey Middlecamp v. Brock Fredin*, Court File No.: 62-HR-CV-17-233, pending in the Minnesota District Court for the County of Ramsey, Second Judicial District.

c. “Document” includes, without limitations, all original written, typed or recorded material or thing of any nature whatsoever, including but not limited to electronic, electromagnetic, or digital recordings, files, or computerized data files and compilations, such as emails, facsimiles correspondence, notes, memoranda, digital photographs, word documents, digital media, text messages, photographs, metadata and reports, in Your possession, custody or control, in the possession, custody or control of Your Chambers, or Your present or former attorneys, agents, representatives or other persons acting or purporting to act on Your behalf’s possession, custody or control. “Document” also included any document affixed to or attached to any document otherwise responsive to this demand, all drafts, and all non-identical copies regardless of origin or location.

d. The term “communication” means, without limitation, any transmission or exchange of information between two or more persons, orally or in writing, and includes, without limitation, any conversation, contact or discussion, whether face-to-face or by means of telephone, letter, correspondence, memorandum, facsimile, e-mail, instant message, social media, text message or any other electronic or media, form, where by chance or design.

e. The term “identify” with respect to persons means to give, to the extent known, the person’s full name, present or last address, and when referring to a natural person, additionally the present or last know place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

f. The term “identify” with respect to documents means to give, to the extent known, the (i) type of document; (ii) general subject matter of the document; (iii) date of the document; and (iv) author(s), addressee(s) and recipient(s) of the document.

g. The term “identify” with respect to communications means to give, to the extent known, the (i) names, addresses and last known places of employment of the participants of the communication; (ii) the subject matter and precise content of the communications; (iii) the location(s) of the communication; (iv) the mode or means of the communication (*e.g.*, written, by telephone, email, meeting, etc.); and (v) the date of the communication.

h. “Including” means “including without limitation.”

i. A document or communication “concerning” or “relating to” a given subject matter means that it concerns, constitutes, contains, embodies, comprises, reflects, identifies, states, refers to, deals with, comments on, responds to, describes or analyzed that subject, including documents, communications or correspondence concerning the contents of other documents, communications or correspondence.

j. The connective “and” and “or” shall be construed either conjunctively or disjunctively as necessary to bring within the scope of these response all responses that might otherwise be construed to be outside of its scope and to give this Demand the broadest reading.

k. The singular form of a word shall be construed to include within its meaning the plural form of the word and vice versa and the use of any tense of any verb shall be considered to also include all other tenses in a manner that gives this Demand the broadest reading.

### INTERROGATORIES

1. Identify each and every person with whom You have had a communication with concerning or relating to Respondent Brock Fredin and describe those communications, including the date and location of where such communication took place, the subject matter of each communication and the name of each person present at the time of such communication.

2. Identify all persons who may have knowledge of the facts and/or allegations contained in the petition filed in the above-captioned action and state Your understanding of their knowledge.

3. Identify all persons who You intend to call as witnesses at a hearing or trial in this action and give a summary of their anticipated testimony.

4. For the past seven (7) years, identify all persons who have made complaints of misconduct, tortious conduct and/or harassment offenses against You; set forth the allegations of the complaint or claim in detail; and describe in detail any action taken by You in response to the complaint or claim. Complaints include, whether formal or informal, verbal complaints, written complaints, lawsuits, agency filings, attorney discipline complaints, complaints to Twitter or any other Internet social media website and any other means by which individuals have made complaints of misconduct, tortious conduct and/or harassment offenses against You.

5. Identify each exhibit You intend or reasonably expect to introduce into evidence at any hearing, trial and depositions or by affidavit in this action.

6. Identify the substance and factual basis for each and every allegation contained in Your petition filed in this action.

7. Identify all communications You had, including identifying the individuals with whom You had the communications, that formed that basis of Your January 24, 2017 Twitter post on the @CardsAgstHrsmt Twitter account in which You stated: "Women of MN: this is Brock Fredin, aka Dan/Will. He has at least two restraining orders against him. Please RT to help keep women safe."

8. Identify all communications You had, including identifying the individuals with whom You had the communications, that formed that basis of Your February 3, 2017 Twitter post

on the @CardsAgstHrsmt Twitter account in which You stated: “Update: alias ‘Felix’ on Bumble. Please share if you have friends using dating apps/sites in the Twine Cities & DM if you’ve been victimized.”

9. Identify the source of all photographs You have obtained depicting Respondent Brock Fredin and posted in tweets on the @CardsAgstHrsmt Twitter account from January 24, 2017 to present.

10. Identify each and every location and computer (or other electronic device) You have used to post tweets on the @CardsAgstHrsmt Twitter concerning or relating to Respondent Brock Fredin.

11. Identify and describe each and every communication You have had with each of the following individuals or entities concerning or relating to Respondent Brock Fredin:

- a. Grace Miller
- b. Emma Miller
- c. Catherine Schaefer
- d. Karmen McQuitty
- e. Jamie Kreil Bajurny
- f. Mike Mullen (City Pages)
- g. City Pages
- h. Jenavieve Hatch
- i. Mark Shrayber
- j. Suana Society
- k. City Attorney Susan Segal
- l. Minneapolis Police Department

- m. Saint Paul Police Department
- n. David McCabe
- o. Paula Kruchowski
- p. Peter Meyer

Dated: July 13, 2017  
Hudson, WI

/s/ Brock Fredin

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*Lindsey Middlecamp*